

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EDWARD PINKESZ on behalf of himself and
all other similarly situated consumers

Index No. CV-12-2508

Plaintiff,

**INITIAL CONFERENCE
QUESTIONNAIRE**

-against-

PORTFOLIO RECOVERY ASSOCIATES LLC

Defendant.

In accordance with Fed. R. Civ. P. 16(b), the Court hereby orders as follows:

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure: **December 14, 2012.**
2. Deadline for first request for production of documents and first request for interrogatories: **January 16, 2013.**
3. If additional interrogatories beyond the 25 (twenty-five) permitted under the Federal Rules are needed, the maximum number of:

Plaintiff: **N/A**; and

Defendant: **N/A**
4. Maximum number of requests for admission by:

Plaintiff: **N/A**; and

Defendant: **N/A**

5. Number of depositions by plaintiff of:

Parties: **5**; and

Non-parties: **5**

6. Number of depositions by defendant of:

Parties: **5**; and

Non-parties: **5**

7. Time limits for depositions: **N/A**.

8. Date of status conference: (joint status report due two business days in advance): **March 15, 2013**.

9. Date for completion of factual discovery: **March 29, 2013**.

10. Number of expert witnesses of plaintiff:

Medical: **N/A**; and

Non-medical: **0**.

11. Date for expert report: **N/A**.

12. Number of expert witnesses of defendant:

Medical: **N/A**; and

Non-medical: **0**.

13. Date for expert report: **N/A**.

14. Date for completion of expert discovery: **N/A**.

15. Have counsel reached any agreement for disclosure of experts' work papers (including drafts) and communications with experts? **N/A**.

16. Time for amendment of the pleadings by: **February 22, 2013**.

17. Number of proposed additional parties to be joined by:

- i. Plaintiff: **5**;
- ii. Defendant: **5**

18. Completion of joinder of additional parties: **February 22, 2013**.

19. Date of pretrial conference (brief *ex parte* statements of settlement position due via fax two business days in advance): **June 28, 2013**.

20. Types of contemplated dispositive motions:

- i. Plaintiff: **summary judgment, class certification**.
- ii. Defendant: **summary judgment**.

21. Dates for filing contemplated dispositive motions: **April 19, 2013**.

22. Does any party object to having this case included in the Court's Electronic Filing program: **No**.

23. Will the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c)?
No.

The parties reserve the right to amend their responses to this initial questionnaire and subsequent Rule 26(f) report.

Dated: Brooklyn, New York
December 11, 2012

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